

## **Joint Implementation Team**

No comments.

### **Pre-Ordering Phase 1 - LAN-to-LAN Access**

No comments.

### **Pre-Ordering Phase 1 - Transferring Files via Diskette**

No comments.

### **Pre-Ordering Phase 1 - Transferring Files Electronically**

No comments.

## **Phase II Interactive Pre-ordering and Interactive Direct Entry Ordering**

### **BellSouth States:**

**"AT&T's response to BellSouth's March 28, 1997 Monthly Surveillance Report describes the development of a third interface, Common Gateway Interface (CGI). This interface will exist as an alternative for those CLECS who want to develop their own presentation systems for use with BellSouth's data and was described in BellSouth's testimony described in the AT&T arbitration proceeding. BellSouth proposed this alternative in September, 1996 and has been working with AT&T on this alternative since it received AT&T's request for data in January, 1997. However, because the CGI alternative builds upon the LENS interface, firm specifications for the CGI interface cannot be provided until the LENS interface is finalized."**

### **AT&T Response:**

BellSouth appears to indicate that AT&T and BellSouth began working on this issue in January, 1997. Following is an accurate representation of the timeline and activities surrounding this issue:

- AT&T and BellSouth first discussed BellSouth's Web Proposal on August 23, 1996. During that meeting, AT&T expressed its desire and need for a machine-to-machine interface rather than a Web-based interface.
- In response to AT&T's request, BellSouth prepared a "White Paper" on September 6, 1996. BellSouth subsequently presented its "White Paper" to this Commission as an option it was willing to provide. This White Paper described two alternative "data stream", "Tag Value" methods of providing the relevant queries and database responses that BellSouth could generate from its Web or CGI Server instead of Web Pages.
- In the following months, AT&T repeatedly requested additional specifications from BellSouth regarding both the Web Page and Tag Value options. None were provided.
- In the Georgia Arbitration Hearings (Docket 6801-U) in November, 1996, BellSouth's witness Gloria Calhoun stated that "what we offered to do was send them (AT&T) just a data stream, unformatted, unrepresented". Despite this testimony, however, and despite AT&T's specific and repeated requests for a machine-to-machine interface and the requests for specifications for other interfaces BellSouth was developing, Ms. Calhoun also stated "that's not something that I think they've taken us up on yet." (See attachment 1-Transcript of Gloria Calhoun in Docket 6801-U) Shortly thereafter, AT&T attempted to continue its dialogue on this subject with BellSouth, only to be told that it would be December or January before BellSouth could meet with AT&T. BellSouth did confirm that the Tag Value method was still available.

- A meeting was finally held on January 23, 1997. During this meeting BellSouth stated that its focus, resources and priority were dedicated to the implementation of the Web Page interface scheduled for release on March 31, 1997. BellSouth also stated that it felt it could implement the "Post" Tag Value method described in the White Paper 30 days after the Web Page interface was implemented. Both parties felt May 1, 1997 would be an obtainable target date for this to occur. AT&T renewed its long standing request for specifications on both the Web Page and Tag Value proposals. BellSouth subsequently provided a document, which upon review by AT&T was determined to be only a slightly enhanced "use case" similar to that contained in the original August 15, 1996, report to the Commission. It provided little information of value to AT&T for use in the development or design of software that would be needed by AT&T.
- The information AT&T needed was not made available until March 20, 1997, and only then following escalation to the executive level in BellSouth. This delay in providing specifications resulted in AT&T's determination that July 1, 1997 was the earliest possible implementation date for AT&T to make use of the Tag Value data stream, given the development and testing required by both parties.
- During the BellSouth CLEC Training Seminar held on April 1, 2 and April 3, 1997, BellSouth presented both the September 6, 1996, and March 20, 1997, documents to the CLEC industry. These documents were represented as an available machine-to-machine alternative to its LENS web pages interface.
- On April 8, 1997 (5 days later), BellSouth reported during the weekly Joint AT&T/BellSouth Implementation Team call that BellSouth had discovered that the Tag Value method described in the September 6 White Paper and the March 20 specifications was not feasible in general, and would definitely not be available for use by July 1, 1997.
- On conference calls held on April 14 and 15, BellSouth and AT&T discussed alternatives ranging from BellSouth delivering Tag Values as originally committed to the possibility of finding a commercial software program to perform the required conversion work. Both BellSouth and AT&T estimated the time to build such a converter to be approximately 2-3 months. No such commercial software was found.
- On April 25, BellSouth faxed to AT&T specifications describing its Web-page outputs, with which AT&T could build its own conversion programs for machine-to-machine operation.
- On May 5, 1997, BellSouth, in a LENS demonstration for AT&T, stated that it had changed the Web page screens as recently as Sunday, May 4. BellSouth further stated that it would continue to change LENS on no less than a monthly basis for

the remainder of the year, and that it was currently producing two releases a week to correct existing errors. BellSouth also advised AT&T that the old releases of LENS would not be available for use once the new releases were in production. The net result of these actions by BellSouth is that the specifications provided to AT&T on April 25 are no longer usable, and it is not feasible for AT&T to attempt to build a machine-to-machine conversion process in such an extremely unstable environment. Indeed, this lack of feasibility is confirmed by the BellSouth through the following information about its views on the need for firm specifications and time for implementation:

- --Its statement from the top of page 8 of this report that "because the CGI alternative builds upon the LENS interface, firm specifications for the CGI interface cannot be provided until the LENS interface is finalized."
- --The requirements BellSouth has placed on AT&T during the planning and negotiations of the permanent interfaces, in which BellSouth continually maintains that any changes in specifications provided by AT&T most likely would result in delays in implementation by BellSouth.
- --The following language from Paragraph 5.1.6-Attachment 15 of the AT&T/BellSouth Georgia interconnection agreement, which demonstrates an orderly, planned, cooperative approach to changes to interfaces. "AT&T and BellSouth agree to adapt the interface based on evolving standards...The Parties agree to use best efforts to implement such changes, including testing of changes introduced, within 7 months of the publication date of guidelines. This preceding target implementation obligation may be modified by mutual agreement."

Thus, not only did BellSouth renege on its commitments to AT&T, which were made to AT&T in numerous meetings and also to this Commission by Gloria Calhoun, it also created an environment which prevents AT&T from using LENS in anything but a human-to-machine environment through at least the remainder of the year. BellSouth's proposed interfaces will thus remain discriminatory through the end of the year.

## **Ordering - Electronic Data Interchange**

### **BellSouth States:**

**"AT&T Comments on BellSouth's March 28, 1997 monthly surveillance report suggest that BellSouth's EDI implementation did not include all tariffed services. However, this has never been a requirement. In its June 12, 1996 order in Docket 6352, the Commission found that "...it is imperative that a reseller have access to the same service ordering provisions, service trouble reporting and informational databases for their customers as does BellSouth" (emphasis added). BellSouth efforts relating to EDI have been based on this objective. BellSouth does not create orders for all services for its retail customers on a totally mechanized basis, nor are such orders always created on the initial contact with a customer. Many services, particularly complex services such as the MultiServ example raised by AT&T, require account team intervention which often results in manual order handling. Services requiring account team intervention, therefore, have not been mapped to EDI for CLEC customers."**

### **AT&T Response:**

**BellSouth accurately quoted the Commission's initial Order in Docket 6352-U, which stated at page 10 that it is imperative that a reseller have access to the same service ordering provisions, service trouble reporting and informational databases for its customers as does BellSouth. BellSouth further states that its efforts relating to EDI have been based on this objective. However, it failed to quote the Commission's second Order in Docket 6352-U, which states on page 4, "BellSouth is to make fully operational and available by December 15, 1996 the Electronic Data Interface capability for receipt and transmission of orders for services in BellSouth's General Subscriber Services and Private Line Tariffs." BellSouth's statement that inclusion of all tariffed services "has never been a requirement" contradicts the Commission's Order.**

**In any event, BellSouth does not provide new entrants with nondiscriminatory access where BellSouth's order handling is not fully automated. For example, BellSouth accesses various databases when processing a complex service order and at some point enters that complex order into its systems. To be nondiscriminatory, BellSouth must provide new entrants with access to those various databases, and with the capability to enter the complex order directly into BellSouth's system, just as BellSouth does.**

## **Trouble Report Entry**

No comments.

### **Daily Usage Data**

No comments.

### **Customer Records - Mechanized Access**

#### **BellSouth States:**

In its Milestones Accomplished:

Requirements developed

4/18/97

In its Milestones Ahead:

Work plan for implementation developed; dates for design completion, implementation, and testing determined

4/22/97

#### **AT&T Response:**

In its April 15th surveillance report, BellSouth stated that it had completed the development of Customer Service Records (CSRs) requirements by April 18th and would develop the workplan by April 22nd. When asked at a meeting between AT&T and BellSouth on April 22nd, BellSouth stated that it did not have any additional written details or requirements for CSRs other than the four pages of view graphs BellSouth had provided previously. On May 1st, AT&T again asked BellSouth for the CSR information, referencing BellSouth's April 15th Surveillance report. Finally on May 7th, BellSouth provided additional information, which AT&T is currently reviewing.

1 manually re-enter it. And we suggested that there are ways  
2 that they could not have to manually re-enter it, even if  
3 they wanted to have it in their own separate ordering  
4 database. There is software that can be used to read that  
5 information that's sitting on your screen, to turn it into  
6 data that can be read by the computer and that can be  
7 manipulated then by the computer and integrated from program  
8 to program.

9 AT&T was not happy with that solution and so what  
10 we offered to do was, rather than present the information to  
11 them on a screen -- that's called a presentation system or  
12 the presentation software that was described in my direct  
13 testimony -- what we offered to do was send them just a data  
14 stream, unformatted, unrepresented. A way to think about that  
15 is if you've ever -- before there was Windows, if you ever  
16 looked at a file on a computer screen that just looked like  
17 symbols and gibberish and -- it wasn't presented, it wasn't  
18 in a presentation format, it was just computer language and  
19 it wasn't something that could be read by a human. We said  
20 we can send it to you that way, so that you can pick it up  
21 and let your system manipulate it if you want to use it that  
22 way. That was the purpose of the September 6 white paper.  
23 But again, that's not something that I think they've taken  
24 us up on yet.

25 So the real difference -- to kind of give you a

## **CERTIFICATE OF SERVICE**

**DOCKET NO. 5825-U**

**This is to certify that I have served copies of the foregoing AT&T's Response to BellSouth's April 15, 1997 Monthly Surveillance Report for Electronic Interfaces upon all parties of record by depositing same in the United States Mail, postage prepaid, this fourteenth day of May, 1997:**

**Jim Hurt, Esq.  
Ofc. of the Consumer's Utility Counsel  
2 Martin Luther King, Jr. Drive  
Plaza Level E - Suite 356  
Atlanta, GA 30334**

**Thomas K. Bond, Esq.  
Office of the Attorney General  
132 State Judicial Building  
Atlanta, GA 30334**

**Fred McCallum, Jr., Esq.  
BellSouth Telecommunications, Inc.  
125 Perimeter Center West  
Room 376  
Atlanta, GA 30346**

**Martha McMillin, Esq.  
MCI Telecommunications Corp.  
780 Johnson Ferry Road  
Suite 700  
Atlanta, GA 30342**

**Carolyn Tatum Roddy, Esq.  
Sprint Communications Co., L.P.  
3100 Cumberland Circle  
Atlanta, GA 30339**

**Peter C. Canfield, Esq.  
Dow, Lohnes & Albertson  
Suite 1600  
One Ravinia Drive  
Atlanta, GA 30345**

**Michael Bradley, Esq.  
Charles E. Campbell, Esq.  
Hicks, Maloof & Campbell  
Suite 2200, Marquis Two Tower  
285 Peachtree Center Avenue, NE  
Atlanta, GA 30303-1234**

**Newton M. Galloway, Esq.  
Post Office Box 632  
113 Concord Street  
Zebulon, GA 30295**

**Sheryl A. Butler, Esq.  
Regulatory Law Office  
Department of the Army  
Litigation Center, Suite 713  
901 N. Stuart Street  
Arlington, VA 22203-1837**

**C. Christopher Hagy, Esq.  
David I. Adelman, Esq.  
Sutherland, Asbill & Brennan  
999 Peachtree Street, N.E.  
Atlanta, GA 30309-3996**



Charles A. Hudak, Esq.  
Gerry, Friend & Saprnov  
Suite 1450  
Three Ravinia Drive  
Atlanta, GA 30346-2131

Mr. Brian Sulmonetti  
Director, Regulatory Affairs  
LDDS Worldcom  
Suite 400  
1515 South Federal Highway  
Boca Raton, FL 33432

James D. Comerford, Esq.  
Long, Aldridge & Norman  
One Peachtree Center  
303 Peachtree St., Suite 5300  
Atlanta, GA 30308

Mr. Timothy Devine  
MFS Communications Co., Inc.  
Six Concourse Parkway  
Suite 2100  
Atlanta, GA 30328

L. Craig Dowdy, Esq.  
Long, Aldridge & Norman  
One Peachtree Center  
303 Peachtree Street  
Atlanta, GA 30308

L. M. Mott  
GTE Mobilnet Inc.  
245 Perimeter Center Parkway  
Atlanta, GA 30346

Charles V. Gerkin, Jr. Esq.  
Troutman Sanders  
5200 Nations Bank Plaza  
600 Peachtree Street, N.E.  
Atlanta, GA 30308-2216

Jodie Donovan-May, Esq.  
Eastern Region Counsel  
Teleport Communications Group  
2 Lafayette Centre, Suite 400  
1133 21st Street, N.W.  
Washington, DC 20036

Andrew D. Lipman, Esq.  
Swidler & Berlin  
3000 K Street, NW  
Suite 300  
Washington, DC 20007

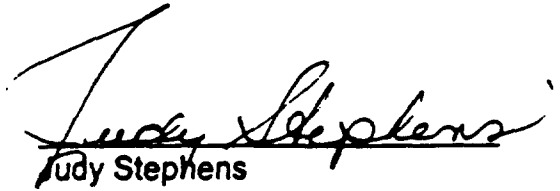
Mr. John P. Silk  
Georgia Telephone Association  
1900 Century Boulevard  
Suite 8  
Atlanta, GA 30345

Stephen B. Rowell, Esq.  
ALLTEL Corporate Services, Inc.  
One Allied Drive  
Little Rock, AK 72202

Andrew O. Isar  
Telecommunications Resellers Assn.  
4312 92nd Avenue, NW  
Gig Harbor, WA 98335

Peyton S. Hawes, Jr., Esq.  
127 Peachtree St., N.E.  
Suite 1100  
Atlanta, Georgia 30303-1810

Craig J. Blakeley, Esq.  
Gordon & Glickson, P.C.  
2555 M Street, N.W., Suite 302  
Washington, D.C. 20037-1302

  
Judy Stephens

# ATTACHMENT 15

RECEIVED JUL 29 1997



**A. J. Calabrese**  
LIAM Vice President  
Southern States

Room 10144  
1200 Peachtree St.  
Atlanta, GA 30309  
404 810-4575  
FAX: 404 810-4593

July 28, 1997

Mr. Quinton Sanders, Director  
AT&T Regional Account Team  
Suite 410  
1960 West Exchange Place  
Tucker, GA 30084

Dear Quinton:

Now that we have both returned from vacation, I am responding to your letter of June 18. In that letter, I thought you fell short of answering my questions regarding billing process improvement and, instead, attached a June 11, 1997, letter that offers to train AT&T to reduce order input errors and ensure that pre-ordering, ordering, provisioning, maintenance, and billing processes are clearly understood. In that letter you also seemed to be comparing AT&T's local order entry performance (after only a few months of experience) to BellSouth's billing performance (given its decades of experience). Nevertheless, AT&T is always interested in improving customer service and will certainly avail itself of real opportunities to improve our customers' experience and to work with BellSouth to ensure that all processes are clearly understood by both companies.

The performance data you shared in the June 11 letter (which I first received as an attachment to the June 18 letter) regarding errors and primary targets for improvement are substantiated by our own data and provide a start toward understanding the problem and the joint plan for improvement. AT&T's analysis of the data indicates that the Address Validation errors are largely attributable to input errors made by service representatives as they take customer information they view in BellSouth's IC Reference system and recreate it by manually re-typing it into the Local Service Request format. AT&T anticipated that this input error problem would be significant, and we attempted to develop an interface to LENS via "tagged data" to avoid this very situation. However, as you know, BellSouth was unable to develop the "tagged data" capability that we had agreed upon.

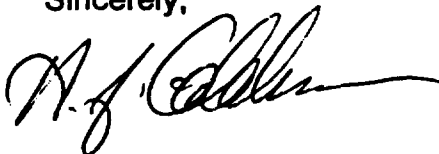
Since the opportunity for that development has passed, AT&T must manually transfer information from BellSouth's database to our own internal ordering interface. Even as AT&T migrates its users from IC-Reference to BellSouth's LENS application, data must still be manually transferred into AT&T's ordering system. Therefore, I am not sure that additional training on the use of BellSouth's validation system, either IC-Reference or BellSouth's LENS, would be especially helpful in reducing the types of errors that AT&T is experiencing because of the manual processes AT&T is relegated to use. These errors are largely the result of AT&T having to use the interim systems available today and having to manually link data in order to complete a service order.

In fact, AT&T feels that order entry errors would be eliminated only if BellSouth provided an interface at parity to the interface it uses for itself. BellSouth has the advantage of comparatively well designed ordering systems that allow the BellSouth agent to validate data and populate the BellSouth service order without manual re-entry of the pre-order information. Indeed, BellSouth's order entry system for itself practically eliminates BellSouth's risk of service order error by providing interactive editing prior to order submission. BellSouth has a great advantage over AT&T in that BellSouth has been able to eliminate re-work associated with order clarification that AT&T must perform.

Since parity interfaces are currently unavailable, the performance data that you provided with your June 18 letter simply validates the fact that manual interfaces such as IC-Reference will handicap new market entrants by substantially increasing the pre-order entry error rate. AT&T agrees with BellSouth's assessment that it will be difficult to achieve the levels of customer satisfaction AT&T desires in this manual environment.

We feel that continuous communication and sharing learnings are vital to monitor progress as we both strive to improve our performance. We also encourage BellSouth to improve its performance and provide parity electronic interfaces to AT&T as an urgent priority so that AT&T can efficiently meet the level of service that our customers demand and deserve.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Calabrese", with a long, sweeping horizontal line extending to the right.

Al Calabrese

Attachment

cc: Pam Nelson

**BellSouth Interconnection Services** 770 492-7560  
Suite 410 Fax 770 621-0629  
1960 West Exchange Place  
Tucker, Georgia 30084

**Quinton E. Sanders**  
Senior Director -  
AT&T Regional Account Team

**June 18, 1997**

**Mr. A. J. Calabrese**  
**LIAM Vice President**  
**Southern States**  
**AT&T**  
**Room 10144**  
**1200 Peachtree Street**  
**Atlanta, Georgia 30309**

**Dear Al:**

Thank you for your letter of June 17 addressing the Atlanta Journal and Constitution article concerning billing errors. Let me respond to your questions in that letter.

First, BellSouth is also concerned about errors on customers bills. We have many safeguards built into our mechanized systems to avoid errors. In addition, we often develop new procedures/processes to improve ordering and billing accuracy. We proactively audit our own ordering and billing procedures. . . and systems to detect human or machine errors. When we find a billing discrepancy we correct it right away in a "customer friendly" manner. In this regard, as the ESSX® article makes clear, our current policy is: "Where cases of overbilling are discovered, we will refund the overbilling - with interest, without any netting for past underbilling. On the other hand, we will not assess charges for past underbilling; we will simply adjust future billing appropriately". Also, I should point out that our error rate is very low compared to the number of bills and number of items we process. In any event, immediately upon resale of an ESSX System, BellSouth will verify the billing for that system.

Let me respond to your comment regarding BellSouth's compliance to its billing obligations under our Interconnection Agreement. Attachment 6 of the agreement relating to "testing procedures" and "bill accuracy certification" outlines the process to ensure quality billing. As you know, both our teams are currently working to implement this portion of the agreement and will continue to do so until we are jointly satisfied with the outcome.

Finally, as AT&T prepares to enter the local market, I'm sure you are developing an appreciation for how sophisticated ordering and billing systems must be. Thus, the people responsible for processing orders must be extremely knowledgeable. Judging from the high

error rate on the local orders you've sent us, so far, it is most probable that billing errors will occur. Let me suggest you take advantage of the offer in my letter of June 11, 1997 (attached) to provide support in this area.

Sincerely,

  
Attachment

cc: Mark Feidler  
Joe Baker  
Terrie Hudson

# **ATTACHMENT 16**



**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  
COLUMBIA, SOUTH CAROLINA**

**HEARING #9633**

**JULY 7, 1997**

**11:00 A.M.**

**DOCKET NO. 97(101(C: BELLSOUTH TELECOMMUNICATIONS, INC. - Entry  
into InterLATA Toll Market [Section 271].**

**HEARING BEFORE:** Chairman Guy Butler, Presiding; Vice Chairman Philip T. Bradley; and Commissioners Rudolph Mitchell, Cecil A. Bowers, Warren D. Arthur, IV, William "Bill" Saunders, and C. Dukes Scott.

**STAFF:** Gary E. Walsh, Deputy Executive Director; D. Wayne Burdett, Manager, and James M. McDaniel, William O. Richardson, and David S. Lacoste, Utilities Department; R. Glenn Rhyne, Manager, and James E. Spearman, Research Department; F. David Butler, Esq., General Counsel; and MaryJane Cooper and Yvonne T. Grey, Hearing Reporters.

**BELLSOUTH COMPANIES:** Harry M. Lightsey III, Esq., William F. Austin, Esq., William Ellenburg, Esq., and Edward Rankin, Esq., representing BELLSOUTH TELECOMMUNICATIONS, INC.

Kevin A. Hall, Esq., and Dwight F. Drake, Esq.,  
representing BELLSOUTH LONG DISTANCE, INC.

**INTERVENORS:** William R. Atkinson, Esq., Darra W. Cothran, Esq., and Carolyn C. Matthews, Esq., representing SPRINT COMMUNICATIONS COMPANY, L.P.

John M.S. Hoefer, Esq., and Marsha A. Ward, Esq., representing  
MCI TELECOMMUNICATIONS, INC.

B. Craig Collins, Esq., and Mitchell M. Willoughby, Esq.,  
representing SOUTH CAROLINA CABLE TELEVISION ASSOCIATION.

Herbert Buhl, Esq., representing COMMUNICATION WORKERS  
OF AMERICA.

Francis P. Mood, Esq., Kenneth P. McNeely, Esq., Michael Hopkins, Esq., and Steve A. Matthews, Esq., representing AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

Elliott F. Elam, Jr., Esq., representing CONSUMER ADVOCATE  
FOR THE STATE OF SOUTH CAROLINA.

Russell B. Shetterly, Jr., Esq., representing ACSI (American Communications Services, Inc.).

M. John Bowen, Jr., Esq., representing SOUTH CAROLINA  
TELEPHONE COALITION.

Frank R. Ellerbe III, Esq., representing SOUTH CAROLINA  
COMPETITIVE CARRIERS ASSOCIATION.

**TRANSCRIPT OF TESTIMONY AND PROCEEDINGS  
VOLUME 1 OF 7**

**INDEX****PAGE****OPENING STATEMENTS:**

Mr. Lightsey .....	7
Mr. Drake .....	14
Mr. Atkinson .....	16
Mr. Hoefer .....	16
Mr. Buhl .....	18
Mr. McNeely .....	19
Mr. Elam .....	20
Mr. Shetterly .....	20

**TESTIMONY OF ALPHONSO VARNER**

Direct Examination by Mr. Austin .....	21
Hearing Exhibit #1 Marked for Identification	
And Accepted Into Evidence .....	86
Hearing Exhibit #2 Marked for Identification	
And Accepted Into Evidence .....	163
Cross Examination by Mr. Buhl .....	175

**TESTIMONY OF GLORIA CALHOUN**

Direct Examination by Mr. Ellenburg .....	178
Hearing Exhibit #3 Marked for Identification	
And Accepted Into Evidence .....	245
Cross Examination by Mr. Atkinson .....	252
Cross Examination by Ms. Ward .....	256

1     dates are available in the pre-ordering phase via LENS, is  
2     that correct?

3     A     Yes, I did. Due dates are in kind of a gray area  
4     between pre-ordering and ordering, and they are available  
5     through LENS in both the pre-ordering mode and the ordering  
6     mode. But, depending on which mode you're in, due dates can  
7     be slightly different. So you can't always characterize  
8     them as being strictly pre-ordering.

9     Q     Well, then, you just contradicted yourself, didn't you?  
10    either they are or they aren't available in the pre-ordering  
11    phase?

12   A     Due date information is available in the pre-ordering  
13   phase, yes.

14   Q     Isn't it true, Ms. Calhoun, that only the intervals are  
15   available in the pre-ordering phase, and that the CLEC does  
16   not have due date information available to it in the pre-  
17   ordering phase?

18   A     No, I don't think that's true.

19   Q     Okay. Later on page 11, I think down around line 19,  
20   you address the dual entry issue that competing LECs have.  
21   And that's one of the issues that Competing LECs have given  
22   to Commissioners about why LENS is not, I guess, sufficient  
23   from a Competing LECs' perspective and is not in parity.  
24   You mentioned that there are a couple of different options

1 or three different options that a CLEC can avail itself of.  
2 One is, that a CLEC can take information off of one screen,  
3 on the inquiry screen, and cut-and-paste it to the CLECs'  
4 Microsoft compatible screen on their system, is that  
5 correct?

6 A Yes, that's one way to do it.

7 Q Okay. Now, if you use cut-and-paste, that just  
8 eliminates the need to retype it, isn't that correct?

9 A Yes. That's what we mean by manual re-entry of data.

10 Q Okay. And so, if the CLEC doesn't have the Microsoft  
11 compatible order entry system, then cut-and-paste is not  
12 even an option, is it?

13 A That's correct.

14 Q Okay. And it takes time to cut-and-paste, does it not?

15 A Yes, but not much.

16 Q Okay. But even so, does the BellSouth order entry  
17 representatives have to cut-and-paste or re-enter any  
18 information?

19 A Yes, sometimes they do.

20 Q For example, what?

21 A For example, there are some instances of telephone  
22 number assignment that can't be carried over directly to a  
23 service order, and service reps will actually have to write  
24 them down and re-enter them.

1 Q But they have various databases available to them at  
2 one time that they can toggle between, and things of that  
3 nature, isn't that right?

4 A Yes.

5 Q Okay. And that's not available to a Competing LEC, and  
6 that's why the Competing LEC has to write this information  
7 down -- because if they get out of one screen, then that  
8 information is gone -- is that correct?

9 A No, I don't think that's correct.

10 Q Okay. To obtain the data -- one of the other options  
11 is to obtain the data for the CLEC through its own  
12 customization, is that correct?

13 A Yes.

14 Q And provide its own customized interface? To do that,  
15 the CLEC would need to know the specifications of the  
16 BellSouth system, is that correct?

17 A Yes.

18 Q And the specifications will help that CLEC evaluate the  
19 cost and what they would need to do in order to build their  
20 own interface, is that correct?

21 A Yes.

22 Q Okay. Now, Ms. Calhoun, maybe you can help me with  
23 this, because MCI has asked probably six weeks ago and has  
24 continuously asked in the past six weeks to get the

1 specifications from BellSouth. Should we be asking you or  
2 somebody in your group for the specifications on LENS?

3 A Well, you could.

4 Q Can I?

5 A I would be happy to provide them. If there has been  
6 some misunderstanding, we certainly want to make our  
7 specifications available to MCI.

8 Q All right. And if it is not you, who else should we  
9 talk to to get a response?

10 A You could talk with Linda Tate.

11 Q BellSouth has been continuously -- well, there have  
12 been several additions to the LENS. One is, the zip code  
13 information is now available that Competing LECs wanted.  
14 The other that I'm aware of is, the customer service  
15 records, and you mentioned that in your testimony. When  
16 LENS is updated, when and how are Competing LECs notified of  
17 any changes in the system?

18 A I think it depends on the system and the degree of the  
19 change. What has happened up to this point is that we have  
20 had CLEC conferences, and we have presented information in  
21 those conferences, and we have also had CLEC training  
22 classes. So, now that people are beginning to be trained on  
23 LENS, we're providing that information in the context of the  
24 training and in updates to the training manuals that are

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  
COLUMBIA, SOUTH CAROLINA

HEARING #9633

JULY 7, 1997

2:30 P.M.

DOCKET NO. 97-101-C: BELLSOUTH TELECOMMUNICATIONS, INC. -  
Entry into InterLATA Toll Market [Section 271].

HEARING BEFORE: Chairman Guy Butler, Presiding; Vice Chairman Philip T. Bradley; and Commissioners Rudolph Mitchell, Cecil A. Bowers, Warren D. Arthur, IV, William "Bill" Saunders, and C. Dukes Scott.

STAFF: Gary E. Walsh, Deputy Executive Director; James M. McDaniel, William O. Richardson and David S. Lacoste, Utilities Department; F. David Butler, Esq., General Counsel; and Yvonne T. Grey, Hearing Reporter.

BELLSOUTH COMPANIES: Harry M. Lightsey III, Esq., William F. Austin, Esq., William Ellenburg, Esq., and Edward Rankin, Esq., representing BELLSOUTH TELECOMMUNICATIONS, INC.

Kevin A. Hall, Esq., and Dwight F. Drake, Esq., representing BELLSOUTH LONG DISTANCE, INC.

INTERVENORS: William R. Atkinson, Esq., Darra W. Cothran, Esq., and Carolyn C. Matthews, Esq., representing SPRINT COMMUNICATIONS COMPANY, L.P.

John M.S. Hoefer, Esq., and Marsha A. Ward, Esq., representing MCI TELECOMMUNICATIONS, INC.

Mitchell M. Willoughby, Esq., representing SOUTH CAROLINA CABLE TELEVISION ASSOCIATION.

Herbert Buhl, Esq., representing COMMUNICATION WORKERS OF AMERICA.

Francis P. Mood, Esq., Kenneth P. McNeely, Esq., Michael Hopkins, Esq., and Steve A. Matthews, Esq., representing AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

Elliott F. Elam, Jr., Esq., representing the CONSUMER ADVOCATE FOR THE STATE OF SOUTH CAROLINA.

Russell B. Shetterly, Jr., Esq., representing AMERICAN COMMUNICATIONS SERVICES, INC.

Frank R. Ellerbe, III, Esq., representing SOUTH CAROLINA COMPETITIVE CARRIERS ASSOCIATION.

TRANSCRIPT OF TESTIMONY AND PROCEEDINGS  
VOLUME 2 OF 7

I N D E XPAGETESTIMONY OF GLORIA CALHOUN

Cross-Examination by Ms. Ward (Resumed) .....	3
Cross-Examination by Mr. Hopkins .....	41
Cross-Examination by Mr. Ellerbe .....	77
Cross-Examination by Mr. Butler .....	80
Examination by Vice Chairman Bradley .....	81
Redirect Examination by Mr. Ellenburg .....	81



1 think you might be able to do it?" And BellSouth gets those  
2 kinds of inquiries and handles those by looking at an  
3 installation calendar.

4 Q. Isn't that going to be the exception rather than the rule?

5 A. I don't know.

6 Q. So you don't know if new entrants are going to--would you  
7 expect new entrants to try to get due dates when they are not  
8 going to place an order on a regular basis?

9 A. I don't know. Again, the due date information isn't  
10 necessarily required for many of the types of orders that we  
11 would expect new entrants to place. If an existing customer  
12 wants to switch their service to another local service  
13 provider, their service is already installed. Again, that's a  
14 billing record change. So, I mean, I can't really say that  
15 they would need access to that information on most of the  
16 orders.

17 Q. Let's talk about LENS capacity. How many simultaneous  
18 users can LENS support?

19 A. We haven't found the upper limit of that yet. We're still  
20 working to try to find out if there is a point where we would  
21 have a problem.

22 Q. Have you identified any number?

23 A. The number changes depending on the test conditions.  
24 We're operating totally separate from the LENS system that's